

From: barry delin
To: [ETF SMB Board Feedback](#)
Cc: wellwisconsin@staywell.com
Subject: Deceptive letter from Staywell
Date: Saturday, May 26, 2018 10:41:19 AM

To the Group Insurance Board:

Last week I received a letter from The Staywell Company, LLC indicating I had not, as of May 1, 2018, completed certain actions that are required under the Well Wisconsin program. However, I never registered for that program. Moreover I am aware that many persons who did not register for the program received the same letter. It would not surprise me if the letter was sent to every adult covered through an ETF sponsored health insurance program who had not registered for the voluntary Well Wisconsin option.

I would have had no problem if the letter had urged me to register for the program and then to complete the health screening, health assessment, and well-being activity the program entails. The reason the letter is highly deceptive is that it calls out the letter recipient for not performing actions that the recipient has never agreed to perform. A casual or careless reader might even wonder whether s/he had registered for Well Wisconsin or had otherwise failed to perform actions required under the rules of her/his health insurance program.

Though the letter was sent by Staywell, the Group Insurance Board has the responsibility to monitor and correct the actions of its agents. I urge the Group Insurance Board to instruct Staywell to never send another communication to non-participants in the Well Wisconsin program that so obscures their participation status. I also urge the Board to direct Staywell to send a letter informing non-participants that they are not currently in the Well Wisconsin program and that it remains their choice as to whether to register for the program.

Finally, I urge the Group Insurance Board to reconsider whether Staywell should continue to administer the Well Wisconsin program. My recommendation is informed by more than last week's deceptive letter. When considering whether to register for the program, I sought information on the Staywell website for two issues. The first was detailed information about the nature of the \$150 incentive, especially about any restrictions as to vendors, services and products. The second and ultimately more important issue was on the absence of information about any limitations on Staywell's use of and ability to sell de-identified individual level health information. I could not find adequate information about either issue on the website. Given this lack of transparency, I decided not to participate in the Well Wisconsin program despite my general agreement with the the goals of wellness programs and that I have, in point of fact, performed the three actions that the current program requires.

Please feel free to contact me if you have any questions. I hope that in the future the Board will do a better job of protecting the dignity and interests of those it serves.

Yours truly,
Barry S. Delin